

FILED

JUL - 3 2024

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

SAMUEL DAVIS and
MICHAEL HILL,

Defendants.

No.

4:24CR343-SRC/JSD

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. The Northwoods Police Department (“NPD”) was a law enforcement agency in the Eastern District of Missouri;
2. Among other functions, the NPD was responsible for investigating crimes occurring in Northwoods, Missouri;
3. Defendants SAMUEL DAVIS and MICHAEL HILL were employed by the NPD as police officers;
4. Defendant MICHAEL HILL was defendant SAMUEL DAVIS’s supervisor;
5. Defendants SAMUEL DAVIS and MICHAEL HILL were sworn to uphold the United States Constitution, as well as the laws of the State of Missouri;
6. On or about July 4, 2023, Defendants SAMUEL DAVIS and MICHAEL HILL encountered C.G. after responding to a call for service at a Walgreens in Northwoods, Missouri.

COUNT ONE
[18 U.S.C. § 241]

7. Paragraphs 1-6 are incorporated here.

8. On or about July 4, 2023, within the Eastern District of Missouri, the defendants,

SAMUEL DAVIS AND MICHAEL HILL,

while acting under color of law, did knowingly and willfully conspire and agree together and with each other, to injure, oppress, threaten, and intimidate C.G. in the free exercise and enjoyment of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizure by one acting under color of law, which includes the right to be free from the use of unreasonable force by a law enforcement officer. The defendants' acts included kidnapping.

In violation of and punishable under Title 18, United States Code, Section 241.

COUNT TWO
[18 U.S.C. § 242]

9. Paragraphs 1-6 are incorporated here.

10. On or about July 4, 2023, within the Eastern District of Missouri, the defendants,

SAMUEL DAVIS AND MICHAEL HILL,

while acting under color of law and aiding and abetting one another, willfully deprived C.G. of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizure, which includes the right to be free from the use of unreasonable force by a law enforcement officer. Specifically, 1) defendant MICHAEL HILL instructed defendant SAMUEL DAVIS to take C.G. to Kinloch, Missouri, which is outside the jurisdiction of the NPD, and 2) defendant SAMUEL DAVIS then drove C.G. to a field in Kinloch, Missouri, where defendant SAMUEL DAVIS physically assaulted C.G., including by striking him with his police baton, while C.G. was handcuffed and did not pose a threat to anyone. The defendants' acts

included kidnapping, involved the use of a dangerous weapon, and resulted in bodily injury to C.G.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT THREE
[18 U.S.C. § 1512(b)(3)]

11. Paragraphs 1-6 are incorporated here.

12. On or about July 4, 2023, within the Eastern District of Missouri, the defendant,

SAMUEL DAVIS,

did knowingly engage in misleading conduct toward another person with the intent to hinder, delay, and prevent the communication to a federal law enforcement officer and judge of information relating to the commission and possible commission of a federal offense in the Eastern District of Missouri, specifically, the offense of Deprivation of Rights under Color of Law, as alleged in Count Two of this Indictment. That is, defendant SAMUEL DAVIS made a misleading statement to a police dispatcher by falsely reporting that C.G. was “GOA” or “Gone on Arrival” when defendant SAMUEL DAVIS responded to Walgreens in Northwoods, Missouri, on July 4, 2023, after receiving a call for service related to C.G. This statement was misleading because, in truth and in fact, defendant SAMUEL DAVIS knew that C.G. had been present at the Walgreens at the time NPD arrived there because defendant SAMUEL DAVIS handcuffed C.G. at the Walgreens and transported C.G. from the Walgreens to a field in Kinloch, Missouri.

In violation of and punishable under Title 18, United States Code, Section 1512(b)(3).

COUNT FOUR
[18 U.S.C. § 1519]

13. Paragraphs 1-6 are incorporated here.

14. On or about July 4, 2023, within the Eastern District of Missouri, the defendant,

SAMUEL DAVIS,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau

of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, defendant SAMUEL DAVIS knowingly altered, concealed, covered up, and falsified an NPD record by turning off his department-issued body worn camera before concluding his interaction with C.G.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT FIVE
[18 U.S.C. § 1001]

15. Paragraphs 1-5 are incorporated here.

16. On or about July 13, 2023, within the Eastern District of Missouri, the defendant,

MICHAEL HILL,

knowingly and willfully made a materially false, fictitious, and fraudulent statement in a matter within the jurisdiction of the executive branch of the Government of the United States, to-wit: defendant MICHAEL HILL falsely told Federal Bureau of Investigation Special Agents who were investigating a civil rights violation within their jurisdiction that, on July 4, 2023, C.G. requested to go to Kinloch, Missouri by stating that C.G. “had people” in Kinloch, when defendant MICHAEL HILL knew that C.G. had not made any such statement and thus defendant MICHAEL HILL knew that his statement to the FBI was false.

In violation of and punishable under Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

CHRISTINE KRUG
Assistant United States Attorney